

REMARKS

In the above-mentioned Office Action, all of the pending claims, claims 44-45, 47-81, 84, 86-104, and 106-108, were rejected. Claims 44-45, 47-52, 56-70, 72, 75-81, 84, 86, 90-97, 104, and 106-108, were rejected under Section 103(a) over the combination of Nishimoto and Bowen. And, claims 71, 89, and 98-103 were rejected under Section 103(a) over the combination of Nishimoto, Bowen, and Hughes. And, claims 73-74, 87, and 88 were rejected under Section 103(a) over the combination of Nishimoto, Bowen, and Grant.

Responsive to the rejection of the independent claims over the combination of Nishimoto and Bowen, independent claims 44 and 104 have been amended, as set forth herein, in manners believed better to distinguish the present invention over the cited combinations of references. The amendments also delete recitations relating to subject matter that the Examiner indicated to be disclosed in the cited references.

With respect to claim 44, the recitation of the device housing has been amended, now to state that the housing has front, rear, top face, and bottom face surfaces. The recitations of the speaker, microphone, display, and alphanumeric keyboard are again recited. The recitation of the alphanumeric keyboard is amended to state that keys of the keyboard are organized into three rows of letter keys. An upper row is stated span both left and right hand sides of the front surface of the housing and are stated to be disposed such that five letter keys of the upper row are disposed on each side of the vertical reference line. Keys in a middle row are stated be disposed such that five letter keys are disposed on one side of the vertical reference line and four letter keys are disposed on the other side of the vertical reference line. Keys in a lower row are stated to be disposed such that four letter keys are disposed on one side of the vertical reference line and three letter keys are disposed on the other side of the vertical reference line. The recitation of the alpha numeric keyboard in claim 104 is analogously amended.

Support for the amendments is found in the disclosure, e.g., on page 14, lines 20-21, page 15, lines 1-4, and page 15, lines 17-20, and Figure 2 of the drawings, which shows the vertical

references line 40 and three rows of letter keys 32A, configured in the manners recited in the amended claims.

The Applicants assert that Nishimoto fails to disclose the structure, recited now in the amended claims. Accordingly, the Applicants respectfully traverse the Examiner's rejection of the independent claims based on the combination of Nishimoto and Bowen. Specifically, the Applicants assert that Nishimoto fails to disclose a keyboard having keys laid out in QWERTY style separate from a display. And, the Applicants further assert that Nishimoto fails to disclose a keyboard organized into three rows of letter keys, configured in the manner as now-recited.

The Examiner relies upon Nishimoto for showing a software keyboard that is displayed on a screen of a display and a key pad 3 formed of a group of control keys including a cursor key 5. To the extent that Nishimoto discloses a complete alphanumeric keyboard having keys laid out in QWERTY style, such a keyboard is only displayed on a display and is not separate from the display. Therefore, the Applicants assert that Nishimoto fails to disclose a display and a keyboard separate from the display.

Figures 3 and 4 of Nishimoto show an on-screen, software keyboard. The keyboard is not of a configuration permitting a vertical reference line to be positioned such that the lower row has four letter keys disposed one side of the vertical line and three letter keys on the other side of the vertical reference line while causing the upper row to have five letter keys on each side of the vertical reference line and the middle row to have five letter keys on one side, and four letter keys on the other side of the vertical reference line.

Bowen was not cited for showing, nor appears to show, this structure, as now-recited. Accordingly, the Applicants assert that Nishimoto and Bowen cannot be combined to form the invention, as now-recited.

The additional references of Hughes and Grant also were not cited for showing, nor appear to show, this structure. The Applicants further assert that these additional references cannot be combined with Nishimoto and Bowen to form the invention, as now-recited.

Amendments to various of the dependent claims are made responsive to amendments made to their respective parent claims. The dependent claims include all of the recitations of their respective parent claims. These claims are believed to be patentably distinguishable over the cited combinations of references for the same reasons as those just-given with respect to their parent claims.

Accordingly, in light of the foregoing, independent claims 44 and 104, and the remaining dependent claims dependent thereon, are believed to be in condition for allowance. Reexamination and reconsideration for allowance of the claims is, therefore, respectfully requested. Such early action is earnestly solicited.

Respectfully submitted,

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